

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JOSHUA ADAMS,

Index No. 21 - CV - 6779

Plaintiff,  
-against-

**ANSWER**

GENIOR INC. d/b/a SETTEMEZZO and  
LUTHI REALTY ASSOCIATES, LLC

Defendants.

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***PLEASE TAKE NOTICE*** that the Defendant LUTHI REALTY ASSOCIATES, LLC hereby appears in this lawsuit by and through its attorneys THE PRICE LAW FIRM LLC and interposes the following Answer to the complaint served herein:

1. Defendant denies the allegations contained in paragraph 1 of the complaint.
2. Defendant denies the allegations contained in paragraph 2 of the complaint.
3. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 3 of the complaint as the allegation states a legal conclusion.
4. Defendant denies the allegations contained in paragraph 4 of the complaint.
5. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 5 of the complaint.
6. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 6 of the complaint.
7. Defendant denies the allegations contained in paragraph 7 of the complaint.

8. Defendant admits the allegations contained in paragraph 8 of the complaint.
9. Defendant denies the allegations contained in paragraph 9 of the complaint.
10. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 10 of the complaint as the allegations call for a legal conclusion.
11. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 11 of the complaint as the allegations call for a legal conclusion.
12. Defendant denies the allegations contained in paragraph 12 of the complaint.
13. Defendant denies the allegations contained in paragraph 13 of the complaint.
14. Defendant denies the allegations contained in paragraph 14 of the complaint.
15. Defendant denies the allegations contained in paragraph 15 of the complaint.
16. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 16 of the complaint.
17. Defendant denies the allegations contained in paragraph 17 of the complaint.
18. Defendant denies the allegations contained in paragraph 18 of the complaint.
19. Defendant denies the allegations contained in paragraph 19 of the complaint.
20. Defendant denies the allegations contained in paragraph 20 of the complaint.
21. Defendant denies the allegations contained in paragraph 21 of the complaint.
22. Defendant denies the allegations contained in paragraph 22 of the complaint.

23. Defendant denies the allegations contained in paragraph 23 of the complaint.
24. Defendant denies the allegations contained in paragraph 24 of the complaint.
25. Defendant denies the allegations contained in paragraph 25 of the complaint.
26. Defendant denies the allegations contained in paragraph 26 of the complaint.
27. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 27 of the complaint.
28. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 28 of the complaint.
29. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 29 of the complaint.
30. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 30 of the complaint.
31. Defendant denies the allegations contained in paragraph 31 of the complaint.
32. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 32 of the complaint.
33. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 33 of the complaint as the allegation calls for a legal conclusion.
34. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 34 of the complaint as the allegation calls for a legal conclusion.

35. Defendant denies the allegations contained in paragraph 35 of the complaint.
36. Defendant denies the allegations contained in paragraph 36 of the complaint.
37. Defendant denies the allegations contained in paragraph 37 of the complaint.
38. Defendant denies the allegations contained in paragraph 38 of the complaint.
39. Defendant denies the allegations contained in paragraph 39 of the complaint.
40. Defendant denies the allegations contained in paragraph 40 of the complaint.
41. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 41 of the complaint as the allegation calls for a legal conclusion.
42. Defendant denies the allegations contained in paragraph 42 of the complaint.
43. Defendant denies the allegations contained in paragraph 43 of the complaint.
44. Defendant denies the allegations contained in paragraph 44 of the complaint.
45. Defendant denies the allegations contained in paragraph 45 of the complaint.
46. Defendant denies the allegations contained in paragraph 46 of the complaint.
47. Defendant denies the allegations contained in paragraph 47 of the complaint.
48. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 48 of the complaint.
49. Defendant denies the allegations contained in paragraph 49 of the complaint.
50. Defendant denies the allegations contained in paragraph 50 of the complaint.

51. Defendant denies the allegations contained in paragraph 51 of the complaint.
52. Defendant denies the allegations contained in paragraph 52 of the complaint.
53. Defendant can neither admit nor deny the allegations contained in paragraph 53 of the complaint.
54. Defendant can neither admit nor deny the allegations contained in paragraph 54 of the complaint.
55. Defendant denies the allegations contained in paragraph 55 of the complaint.
56. Defendant denies the allegations contained in paragraph 56 of the complaint.
57. Defendant denies the allegations contained in paragraph 57 of the complaint.
58. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 58 of the complaint.
59. Defendant can neither admit nor deny the allegations contained in paragraph 59 of the complaint as the allegations call for a legal conclusion.
60. Defendant denies the allegations contained in paragraph 60 of the complaint.
61. Defendant denies the allegations contained in paragraph 61 of the complaint.
62. Defendant denies the allegations contained in paragraph 62 of the complaint.
63. Defendant denies the allegations contained in paragraph 63 of the complaint.
64. Defendant denies the allegations contained in paragraph 64 of the complaint.

65. Defendant denies the allegations contained in paragraph 65 of the complaint.
66. Defendant denies the allegations contained in paragraph 66 of the complaint.
67. Defendant denies the allegations contained in paragraph 67 of the complaint.
68. Defendant denies the allegations contained in paragraph 68 of the complaint.
69. Defendant denies the allegations contained in paragraph 69 of the complaint.
70. Defendant denies the allegations contained in paragraph 70 of the complaint.
71. Defendant denies the allegations contained in paragraph 71 of the complaint.
72. Defendant denies the allegations contained in paragraph 72 of the complaint.
73. Defendant denies the allegations contained in paragraph 73 of the complaint.
74. Defendant does not have sufficient information to admit or deny the allegations contained in paragraph 74 of the complaint.
75. Defendant denies the allegations contained in paragraph 75 of the complaint.
76. Defendant denies the allegations contained in paragraph 76 of the complaint.
77. Defendant denies the allegations contained in paragraph 77 of the complaint.
78. Defendant denies the allegations contained in paragraph 78 of the complaint.
79. Defendant denies the allegations contained in paragraph 79 of the complaint.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

80. Undue hardship.

81. There would be significant difficulty or expense associated with the specific accommodation.

82. Accordingly, the complaint should be dismissed.

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

83. Direct threat.

84. There is a significant risk of substantial harm to the health or safety of the individual or others that cannot be eliminated or reduced by reasonable accommodation.

**AS AND FOR A COUNTERCLAIM**

85. In the event that there is a statute or contract that permits the recovery of legal fees then Defendant seeks an award of legal fees against Plaintiff.

***WHEREFORE***, based upon the foregoing, Plaintiff's complaint should be dismissed, and Defendants should be awarded relief as follows:

- A) On Defendants' counterclaim, Defendant demands judgment against Plaintiff;
- B) Interest, legal fees, punitive damages, and such other and further relief as is just and proper.

Dated: New York, New York  
August 25, 2021

Respectfully submitted,  
THE PRICE LAW FIRM LLC  
Attorneys for Defendant  
16 Madison Square West a/k/a  
1115 Broadway – Suite 1053  
New York, New York 10010  
(212) 675-1125

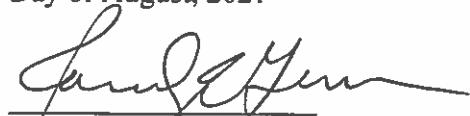
  
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Joshua C. Price, Esq.

**VERIFICATION**

*David Parks, Esq.* avers as follows:

1. I am the property manager and in-house counsel for Defendant. I have read the attached answer and believe the contents to be true.
2. Those allegations made upon information and belief I believe to be true. The source of my information is from the Defendant.

Sworn to on the 25<sup>th</sup>  
Day of August, 2021

  
NOTARY PUBLIC

  
DAVID C. PARKS

RANDY E. GLICK  
Notary Public, State of New York  
No. 4663227  
Qualified in New York County  
My Commission Expires July 31, 2022